

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF VERMONT

UNITED STATES OF AMERICA,

v.

Crim. No. 2:16-cr-84

ALISON GU, a/k/a “Alison Ling,”  
“Ally Koo,” “Ai J. Chen,” “Ai Jen  
Chen,” “Jing Shao,” “Yijing Gu,”  
“Yijing Lin,” “Alison Yi Gu,”  
and  
MATTHEW ABEL,  
Defendant.

**PARTIALLY STIPULATED**  
**MOTION FOR ONE WEEK EXTENSION TO RESPOND**  
**TO MOTIONS TO SEVER**

The United States of America requests a one-week extension to respond to the pending motions to sever filed by defendant’s Gu and Abel (docs. 90 & 91). The Government’s responses are due today, but the undersigned requests an additional week for the following reasons.

The motions were filed on the Friday, February 24, the day before the undersigned began a one-week vacation (much of which was occupied working on the United States appellate brief in *United States v. Sosa-Ramirez*). Upon return to the office this week, that brief – which will be filed today with the Second Circuit -- took up more attention than anticipated. Accordingly, the undersigned

has not been able to devote the desired amount of time preparing a response to the pending motions. The requested extension would provide that time.

The defendants should not be prejudiced by the requested extension. Neither are detained (though there is a pending motion revoke the release of defendant Gu, which will be heard on April 3). Two motions for extensions for defendants to file motions were granted.

Counsel for defendant Abel has advised he stipulates to the requested relief. Counsel for defendant Gu has not responded to an inquiry as to whether he also so stipulates.

Accordingly, the United States requests its deadline for responding to the pending motions be extended to March 17.

Respectfully submitted, this 10<sup>th</sup> day of March, 2017.

UNITED STATES OF  
AMERICA

EUGENIA A.P. COWLES  
Acting United States Attorney

By: */s/ Michael P. Drescher*  
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Certificate of Service

By filing the above document this day via the Court's electronic filing system, I certify a copy will be served on David McColgin and Craig Nolan, Counsel for Defendants.

March 10, 2017

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